

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DARLENE HARRIS,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION 1:14-cv-02355-WSD
v.	)	
	)	
CITY OF ATLANTA.	)	
	)	
Defendant.	)	

**JOINT DETAILED DISCOVERY PLAN**

Plaintiff and Defendant, by and through their counsel, submit the following Joint Detailed Discovery Plan in accordance with the Court's Order approving the parties' request for a discovery extension:

1. The discovery period is currently set to close on April 13, 2015.
2. On October 2, 2014, Plaintiff served interrogatories and requests for production of documents on Defendant. Soon thereafter, the parties were engaged in extensive settlement discussions. However, the parties were unable to reach an agreeable settlement.
3. Defendant is now prepared to respond to Plaintiff's interrogatories and requests for production of documents and will serve its responses no later than Wednesday, February 11, 2015.

4. Defendant intends to serve Plaintiff with written discovery requests on or about Wednesday, February 11, 2015.

5. After exchanging written discovery, the parties will schedule and conduct depositions in this case. The parties expect to conduct depositions the weeks of March 23 and March 30, 2015.

6. At this time, Defendant intends to depose Plaintiff and Plaintiff intends to depose Sergeant Sturdivant, Major Erika Shields, and Alfred Elder. Both parties reserve the right to identify more deponents after written discovery is exchanged.

7. The parties do not intend to designate expert witnesses in this case.

Respectfully submitted this 9th day of February, 2015.

/s/ Cheryl B. Legare

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **JOINT DETAILED DISCOVERY PLAN** with the Clerk of Court by using the CM/ECF system, which will automatically send notification of such filing to the following attorneys of record:

Kristi D.A. Matthews and Robert N. Godfrey

This 9th day of February, 2015.

/s/ Cheryl B. Legare  
Cheryl B. Legare  
Georgia Bar No. 038553

Counsel for Plaintiff